

Frequently Asked Questions about the Tribal Identifier Data Standard

The questions and answers are arranged in four categories:

- General
- Implementation of the Data Standard
- Use of Data Standard
- Technical Questions for Implementers

General:

Q1: What is the Tribal Identifier Data Standard?

A: A “data standard” is a documented agreement among organizations that share or exchange data regarding representation, formats, and definitions for such data. The Tribal Identifier Data Standard provides a common vocabulary to be used by the Environmental Protection Agency (EPA), States, Tribes, and local government agencies to identify Tribal entities. The data standard is made up of a list of data elements, each of which is defined.

Q2: Who developed the Tribal Identifier Data Standard – is this another federal mandate?

A: No, this is not another federal mandate. The decision to develop the Tribal Identifier Data Standard, was made jointly by EPA, the States (through The Environmental Council of the States (ECOS), an organization that represents the heads of the state environmental agencies) and Tribes. All recognized that sharing and exchanging accurate data is important and will remain so. Together, they established the Environmental Data Standards Council (EDSC) to manage and guide the process.

Q3: Why do we need this “common vocabulary”?

A: There are many different environmental programs and many different government agencies involved in reporting environmental data. Often, these different programs or different agencies use different names and codes for the same Tribal entity. In other instances, a general name or code is used to represent all Tribal entities. For example, different agencies may use the name Navajo Nation or NN to refer to the Navajo Nation of Arizona, New Mexico, and Utah while other agencies uses NN to denote any Tribal entity. Further, some agencies track on the basis of reservations, while some Tribal governments occupy several reservations.

If we are to share and compare data from different programs and different agencies, it is important that we identify data uniformly, regardless of what they are called or named by the source of the data. In other words, we need to make sure that “Red Delicious” apples are compared to “Red Delicious” apples even if some people may refer to them as just apples.

Q4: Does the Tribal Identifier Data Standard address the identification of all Tribal entities?

A: No. Currently, the list of permissible values specified in this standard concentrate on the federally recognized Tribes as identified by the Bureau of Indian Affairs.

Q5: Are State recognized Tribes included in the standard?

A: No. The Tribal Identifier Action Team researched the issues regarding identification of State recognized Tribes. Some States do not have a mechanism to recognize Tribal entities, while other States recognize Tribal entities in one portion of its government but not in others. In our efforts to develop a list of state recognized Tribes, we found a lack of consistency in the ways in which States maintain such information. After full consideration of State recognized Tribe issues and the scope of the Tribal Identifier Data Standard, the Action Team concluded that there wasn't a need to exchange State recognized Tribal data between EPA and its federal partners, and a list of State recognized Tribes will not be addressed in this standard.

Q6: Does the Tribal Identifier Data Standard address the identification of Tribal lands?

A: No. The Tribal Identifier Action Team was tasked to construct a clear, concise, and uniform scheme of identifying American Indian Tribes and Alaskan Natives. The Action Team recognized the need for a Tribal lands identification instrument, however the Action Team felt the exploration of a Tribal lands identification mechanism was beyond the scope of its directive. The Action Team forwarded a recommendation to the EDSC to address the identification of Tribal lands in another standard or the revision of Tribal Identifier Action Team directive.

Q7: Does this make it harder for a Tribe to change its official name?

A: The official list of Tribal names will be maintained by the BIA according to their established criteria. They have processes and procedures in place to allow Tribes to petition for changes in the name or composition of the Tribe. Generally, the BIA publishes a new official list of names on an annual basis.

Q8: What happens if a Tribe changes its official name?

A: The EPA will maintain a copy of the official BIA list of Tribal names and related codes in the Environmental Data Registry (EDR). Each of the names/codes in the list will be tagged with an 'Effective Date' (when the name/code became valid on the list) and an 'End Date' (when a name/code is no longer a valid on the list). An updated list will be provided in the EDR soon after the master BIA list is updated. Change tracking on a program system level should be done to meet the business needs of the program.

Implementation of the Data Standard:

Q9: Will my State, Tribal, or local agency (or program) be required to use the Tribal Identifier Data Standard?

A: No State, Tribal, or local government agency (or program) is required to adopt or use the Tribal Identifier Data Standard, nor to incorporate it into that agency's or program's own data systems. However, once EPA and state agencies adopt and begin implementing the data standard, it will likely become the specified "road map" for communications among environmental agencies exchanging environmental information.

Q10: When is the Tribal Identifier Data Standard supposed to be approved by the Tribes, States and EPA?

A: The EDSC has approved the Tribal Identifier Data Standard on August 21, 2002 and EPA is currently considering the standard for final approval.

Q11: Can some programs within a State, Tribe or local government follow the Tribal Identifier Data Standard, while others do not?

A: Use of the Tribal Identifier Data Standard is not required, although over time it may become the standard for sharing or exchanging data to or through the EPA national data systems, as well as between State and Tribal agencies. State, Tribal, or local government programs – especially those that do not exchange data with EPA, other Federal agencies or agencies in other States – are certainly not obliged to adopt or work within the Tribal Identifier Data Standard. However, as it becomes a widely accepted standard, they may find it useful for data management and exchange.

Q12: I am in a Tribal, State, or local government agency. My program doesn't use the same data elements as are used in the Tribal Identifier Data Standard. Is there an expectation that we will change our data elements?

A: No. The data standard uses terminology intended for data *exchange* and is applicable only after the data you send crosses the threshold of your organization. Data that are exchanged will need to map to existing data holdings or conform in definition, meaning, and format to the standard.

Q13: My EPA program doesn't use the data elements that are used in the Tribal Identifier Data Standard. Is there an expectation that we will change our own data elements?

A: Although the data standard is intended for use in data exchange, it is expected that EPA programs will, as necessary (and over time), modify the data elements that they currently collect to conform with the data elements and terms in the Tribal Identifier Data Standard. The schedule for these changes is normally three years, with possible waivers in consideration of modernization and update schedules.

Q14: Is the Tribal Identifier Data Standard the basis for a new data system design? Will we have to change our existing data system to conform to it?

A: The answer for Federal, Tribal, State, and local government agencies is No. The Tribal Identifier Data Standard is more like a dictionary to help translate or exchange data from any one data system to any other. Use of the Tribal Identifier Data Standard does not require that any non-EPA agency or program change its current data system. When data is exchanged from one system to another, the Tribal Identifier Data Standard will provide the necessary information to ensure that data from a given field in the sending system is mapped to the correct location in the receiving system. Local system designers may, once they choose to use this data standard for data exchange, elect to modify their system (perhaps in the context of a previously planned system modernization) in order to create the capability of exchanging data that conforms with the standard. As noted in the response to Question 13 above, EPA will be using the data standard as its own data systems are modified and updated.

Q15: We are planning to update (one or more of) our current data system(s). How can the Tribal Identifier Data Standard help us in this effort?

A: The Tribal Identifier Data Standard will provide clear and concise identification of American Indian and Alaskan Native entities. Using the Environmental Data Registry (EDR), developers can download Tribal Identifier data elements and attributes, allowable values (e.g., code sets), and other types of metadata to use in system design and documentation. Incorporating standardized data, such as data element definitions and specifications and sets of allowable values into systems is more efficient than developing and documenting new data elements. Use of the standard will also facilitate data integration and improve the reusability of data elements.

Q16: Are there any federal funds available to help States, Tribes, or local government agencies that implement federal programs if they choose to update their systems to enable them to communicate more easily using the Tribal Identifier Data Standard?

A: Yes, although such funding is not linked directly to the Tribal Identifier Standard development effort. EPA has and will continue to provide grant funding to assist other levels of government that implement federal environmental programs. Such assistance has often been used by grantees to help develop and update data management systems.

Q17: Our current system uses a flag to indicate a Tribal entity, do we have to implement new data elements to track Tribal entities by name?

A: No. The presence of a given data element in the Tribal Identifier Data Standard does not create a new data collection requirement. Federal, Tribal, State, and local government systems do not need to begin collection of all data for which there are data elements in the data standard.

Q18: What does this standard have to do with National Environmental Information Exchange Network I keep hearing about? Also, I thought everything was supposed to be in XML – is this XML?

A: The Network concept relies upon common “Data Exchange Templates” (DETs) expressed in eXtensible Markup Language (XML), and exchanged based on common protocols. This data standard would be used as the starting point or “core” for Tribal-related DETs. Once established and approved, these flows would replace existing feeds to EPA’s national data systems. For example, several States have used a DET based on the State/EPA Facility Identification Standard to exchange facility data with EPA and other States, using Network protocols. The XML expression of this data standard is complete and a new DET for Tribal identification data was created based on this data standard.

Use of Data Standard:

Q19: Who will use the Tribal Identifier Data Standard?

A: All Federal, Tribal, State, and local government agencies involved in environmental activities with Tribal entities are encouraged to use the Tribal Identifier Data Standard when and if they share or exchange data with other agencies. They are also encouraged to refer to the Tribal Identifier Data Standard, and use it as a tool, if they are planning to update or enhance their own existing data systems. The public will be the ultimate user of the data standard, because it will provide the common vocabulary that will help such end users better understand the source of the data they are looking at.

Q20: Will EPA be issuing rules for use of the Tribal Identifier Data Standard?

A: No, at least not in the sense of issuing formal regulations. Information on the standard will be available through the EDSC website (<http://www.epa.gov/edsc>) and the Environmental Data Registry (EDR) website (<http://www.epa.gov/edr>).

Q21: Will the Tribal Identifier Data Standard be open for revision in the future? How will the standard be maintained?

A: Yes. There is every reason to expect that adjustments or revisions will be necessary in the future. The need for revisions may arise in at least two areas: (1) The evolution, addition, or deletion of Tribal entities, which will necessitate, at a minimum, revisions and additions to the lists of permissible values associated with the standard data elements; and (2) Once in use, we may discover limitations in the data standard that need to be corrected (e.g., additional levels of detail that should be provided, and others). EPA, Bureau of Indian Affairs (BIA), and ECOS expect to maintain an ongoing institutional mechanism to make needed revisions.

Technical Questions for Implementers:

Q22: Do we need to use the permissible values from the data standard?

A: Yes. Permissible values characterize the exact names, codes, and text that can be stored in a data field in an information system. Where the standard specifies permissible values (e.g., Tribal Code includes permissible values such as 007 - St. Regis Band of Mohawk Indians of New York), agencies using the standard should use the specified value to describe a Tribal entity. By taking the effort to use these standard designations, agencies make the fullest use of the standard and ensure more accurate data exchange and interpretation.

Q23: What if I wish to exchange information that isn't covered by the listed permissible values? Does this mean I can't use the standard?

A: No. The Action Team believes that the Tribal Identifier Data Standard will be the core for exchanging Tribal information. The Team anticipates that users exchanging Tribal information going beyond those listed will work out additional permissible values in the context of individual data exchanges among specific data exchange partners. The Team is interested in comments on the workability of such a "partially managed" set of permissible values. The Team also invites comment on whether it would be desirable to develop more extensive lists of permissible values (for example, State recognized Tribal entities).

Q24: Do data elements in our application systems need to be the same data type as the standard data element? What if our data element field lengths are longer or shorter than the standard?

A: This standard only specifies how information will be exchanged, not how systems should be designed. At times, differences between system parameters and data standard specifications may require some translation from a system that uses field lengths, etc. Field lengths in the standard are intended to accommodate the expected maximum length of the values across partner systems based on analysis conducted to date. If a system has a longer value for a given element and the organization wishes to exchange data using the standard, the value exported from the system would have to be adjusted (e.g., truncated or abbreviated). Field lengths in the standard can be increased, if partner needs require this, through the maintenance review of the standard.

Q25: Why isn't an agency's system tribal number/identifier sufficient to identify a Tribal entity uniquely? Why does this matter?

A: Unique identification of a Tribal entity is important because it allows one Tribal entity to be positively identified and distinguished from all others (even those that may have similar names). The objective of the Tribal Identifier Data Standard is to provide a means of uniquely identifying Tribal entities across agencies, programs and levels of government, so that information can be clearly exchanged. Tribal identifiers issued by departmental agencies are typically unique within a program, but not necessarily within an agency. There is typically no assurance that one State's identifying numbers are different from another's. For this reason, the standard specifies a combination of data elements (Tribal Code and Tribal Name) that it believes will provide unique

identification of a Tribal entity.